

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

***In re* SANCTUARY BELIZE  
LITIGATION**

**Civil No. 18-3309-PJM**

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**REPRESENTED DEFENDANTS’ RESPONSE TO  
COURT’S MEMORANDUM ORDER OF MARCH 21, 2023**

Defendants Andris Pukke, Peter Baker, John Usher, Global Property Alliance, Inc., Sittee River Wildlife Reserve, Buy Belize, LLC, Buy International, Inc., Foundation Development Management Inc., Eco Futures Development, Eco-Futures Belize Limited, Power Haus Marketing, Sanctuary Belize Property Owners’ Association, and the Estate of John Pukke (the “Represented Defendants”) respond to the Court’s Memorandum Order of March 21, 2023, by annexing a proposed Order. The proposed Order has three principal purposes.

The first is to implement the mandate of the Fourth Circuit pursuant to *AMG Capital Management, LLC v. FTC*, 141 S. Ct. 1341 (2021), by returning to each of the Represented Defendants the assets and property seized from them and placed in the custody and control of the Receiver. The second is to implement the provision in the Court’s “Final Order of Contempt” against Represented Defendants Pukke, Baker, and Usher (ECF Dkt. No. 1113), that the amounts they owe shall be determined by subtracting from the sanctionable amounts imposed “the amounts, if any, already distributed to consumers by the FTC.” This is to be accomplished by calculating the amounts the consumers were contractually obligated to pay the Represented Defendants but were excused from paying during this litigation, and subtracting those amounts

and any other amounts already distributed to consumers by the FTC from the sanctionable amounts imposed. The third is to implement the Court's injunctions prohibiting the Represented Defendants from having any further involvement with Sanctuary Belize by ordering them to sell all Sanctuary Belize properties returned to them and applying the proceeds to the net amounts they owe.

Respectfully submitted,

/s/ John B. Williams

John B. Williams

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s/ Neil H. Koslowe

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*Counsel for the Represented Defendants and Entities*

Dated: March 28, 2023

**CERTIFICATE OF SERVICE**

I certify that today, March 28, 2023, I served the foregoing Represented Defendants' Response to Court's Memorandum Order of March 21, 2023, on plaintiff by filing it via the Court's CM/ECF system, which automatically will transmit a copy electronically to all counsel of record.

/s/ Neil H. Koslowe

Neil H. Koslowe

Attorney.

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**PROPOSED ORDER**

For the reasons stated, the Court Orders as follows:

1. The Receiver shall file a document calculating and stating the amounts of all assets and property seized from each one of the Represented Defendants and placed in the Receiver's custody and control by order of this Court, together with all source documents and any other documents reasonably requested by the Represented Defendants to confirm the accuracy of the Receiver's calculations.

2. The Receiver shall return to the Represented Defendants all assets, all property, and all passports seized from them and placed in its custody and control by order of this Court.

3. The Receiver shall file a document calculating and stating the amounts of all assets and property it has acquired in this case from each one of the individuals and entities other than the Represented Defendants by order of this Court, together with all source documents and any other documents reasonably requested by the Represented Defendants to confirm the accuracy of the Receiver's calculations.

4. The Receiver shall file a document calculating and stating for each lot purchaser at Sanctuary Belize the monthly amounts each purchaser was contractually bound to pay the Represented Defendants but was excused from paying since this litigation began, as well as the

total amount of all such excused payments, together with all source documents and any other documents reasonably requested by the Represented Defendants to confirm the accuracy of the Receiver's calculations.

5. Plaintiff the Federal Trade Commission shall calculate the amounts owed by defendants Andris Pukke, Peter Baker, and John Usher under the Court's contempt sanctions by subtracting from those imposed sanctions the total amount of all excused payments determined by the Receiver under paragraph 4 above and any other amounts returned to lot purchasers.

6. The Represented Defendants will have 20 days within which to file objections to any of the calculations made by the Receiver or the Federal Trade Commission pursuant to the paragraphs above.

7. The Represented Defendant shall sell all Sanctuary Belize properties returned to them under paragraph 2 and upon which there is a lien in favor of the Receiver or the Federal Trade Commission, and they shall apply the proceeds of those sales to paying the balance of the contempt sanctions calculated by the Federal Trade Commission in paragraph 5 above.

Judge Peter J. Messitte